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June 4, 2024

**BY ECF**

Honorable Katharine H. Parker  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**APPLICATION GRANTED:** The Case Management Conference in this matter scheduled for Wednesday, June 12, 2024 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to **Monday, August 5, 2024 at 10:30 a.m.** The Clerk of Court is directed to mail a copy of this endorsement to the Plaintiff.

**APPLICATION GRANTED**

*Katharine H. Parker*  
Hon. Katharine H. Parker, U.S.M.J.

Re: Gamble v. Assistant Commissioner Antoinette Cort and Captain Erica Dixon. 06/04/2024  
23-CV-6443 (LGS)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Truffant, Acting Corporation Counsel of the City of New York, and the attorney for Defendants Assistant Commissioner Antoinette Cort and Captain Erica Dixon in the above-referenced case.<sup>1</sup> I write on behalf of defendants to respectfully request that the Court adjourn the Case Management Conference currently scheduled for June 12, 2024 at 2:00 pm to June 19, 2024. This is Defendants' first request for an adjournment. Plaintiff consents to the instant request.

By way of background, defendants have been attempting to obtain discovery from plaintiff since January 24, 2024. As plaintiff has yet to provide the requested discovery, defendants moved to compel the discovery on May 21, 2024. (ECF No. 44) On May 23, 2024, the Court referred this matter to Your Honor for general pretrial supervision. (ECF No. 46). On May 28, 2024, Your Honor scheduled a Case Management Conference for June 12, 2024, at 2:00 pm. (ECF No. 47).

<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Jessica Ochoa. Ms. Ochoa is a member in good standing with the New York State Bar (No. 6124655) as well as admitted to practice before the U.S. District Courts of the District of Columbia (No. 1736588) and Maryland (No. 30564). She is currently in the process of being admitted to practice before the present court. Ms. Ochoa may be reached directly at (212) 356-3159.

On June 3, 2024, Defendants' counsel called Plaintiff to discuss the status of discovery and to obtain consent for this extension request. Plaintiff consented to the request and agreed to sign and provide the necessary releases for Defendants to obtain documents relevant to his claims as well as answer Defendants' discovery requests.<sup>2</sup> At this time, Defendants respectfully request an adjournment of the Case Management Conference as counsel will be unavailable on June 12, 2024, at 2:00 pm. Additionally, Plaintiff has indicated that due to his work schedule, a morning conference time would allow him to attend a conference with minimal impact on his employment. Finally, Defendants respectfully request an extension of discovery in light of the above as discovery is currently set to close on June 12, 2024.

Accordingly, Defendants respectfully request that the Court adjourn the scheduling conference on June 12, 2024 to June 19, 2024, preferably in the morning to accommodate Plaintiff's work schedule.

Defendants thank the Court for its time and consideration of these requests.

Respectfully submitted,

/s/ Elissa Jacobs

Elissa Jacobs

Senior Counsel

Special Federal Litigation Division

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<sup>2</sup> While Plaintiff did agree to provide Defendants with discovery, at the time of filing, Defendants have not received the necessary releases or discovery.